

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Ref. No. 833

CERTIFICATION OF COUNSEL

I, Matthew B. McGuire, counsel to FTX Trading Ltd. and its affiliated debtors and debtors-in-possession (the “Debtors”), hereby certify as follows to the best of my knowledge, information and belief:

1. On February 22, 2023, the FTX Debtors, the FTX Committee, Voyager Digital Holdings, Inc. and its affiliated debtors and debtors-in-possession (the “Voyager Debtors”) and the Official Committee of Unsecured Creditors appointed in the chapter 11 cases of the Voyager Debtors entered into that certain stipulation (the “FTX/Voyager Stipulation”)², approved by this Court at Dkt. No. 833, and the U.S. Bankruptcy Court overseeing the Voyager Debtors’ chapter 11 cases (the “SDNY Bankruptcy Court”) at Dkt. No. 1266 in the Voyager Debtors’ chapter 11 cases, with respect to, among other things, certain disputes and claims between the parties, pursuant to which the parties thereto agreed to participate in good faith in non-binding mediation with respect to all claims and disputes among or between the Parties (the “Mediation Matters”).

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

² Capitalized terms used but not defined herein shall have the meaning ascribed to them in the FTX/Voyager Stipulation.

2. On May 19, 2023, the Voyager Debtors' chapter 11 plan went effective³ (the "Voyager Plan") and the Voyager Plan Administrator's duties under the Voyager Plan commenced.

3. The FTX Debtors, the FTX Committee and the Voyager Plan Administrator have engaged in discussions to appoint a mediator to administer a non-binding mediation process to potentially resolve the Mediation Matters. Attached hereto as Exhibit A is the *Stipulation and Agreed Order to Appoint a Mediator* (the "Proposed Order") agreed to by and among the FTX Debtors, the FTX Committee and the Voyager Plan Administrator.

4. Accordingly, the Debtors respectfully request that the Court enter the Proposed Order at its earliest convenience.

³ Voyager Chapter 11 Cases, Dkt. No. 1405.

Dated: June 26, 2023
Wilmington, Delaware

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